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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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Federal Communications Commission
Office of Secretary

In the Matter of)
)
Advanced Television Systems)
and Their Impact Upon the)
Existing Television Broadcast)
Service)

MM Docket No. 87-268

To: The Commission

PETITION FOR RECONSIDERATION

Guy Gannett Communications ("Guy Gannett"), licensee of WGME-TV (Portland, Maine), WGGB-TV (Springfield, Mass.), KGAN(TV) (Cedar Rapids, Iowa), WTWC-TV (Tallahassee, Fla.), WICS(TV) (Springfield, Ill.), WICD(TV) (Champaign, Ill.), and WOKR(TV) (Rochester, N.Y.), hereby petitions the Commission to reconsider certain aspects of its *Fifth Report and Order* and *Sixth Report and Order* (collectively, "the R&O's")^{1/} in the above-captioned proceeding.

Introduction

The Commission's decisions pave the way for an orderly and expeditious transition from analog to digital television broadcasting ("DTV") -- a transition that will greatly enhance and expand the services provided to the public by television broadcasters. Guy Gannett strongly supports the Commission's objectives in this proceeding as well as its blueprint, as

^{1/} *Fifth Report and Order*, MM Docket No. 87-268, FCC 97-116 (released April 21, 1997); *Sixth Report and Order*, MM Docket No. 87-268, FCC 97-115 (released April 21, 1997).

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set forth in the R&O's, for achieving those objectives. In particular, we endorse the Commission's approach of allocating a second channel to existing licensees, so that they may continue to operate their analog NTSC channels while introducing and establishing DTV.

The implementation of this approach, however, is sure to be accompanied by technical difficulties. Doubling the number of stations operating in the VHF and UHF bands during the transition period requires a master's touch to avoid unacceptable interference problems that will severely diminish the service areas of particular stations. The Commission has generated a table of allocations that is meant to minimize such problems, but before they are finally adopted, those allocations need to be carefully reviewed to ensure in each case that (1) stations will not cause or be subject to unacceptable interference and/or reductions in service areas, and (2) even where interference or reductions in service area are not deemed unacceptable, no superior alternative is available.

The Commission Should Provide an Opportunity for Comment on the Table of Allocations After OED Bulletin No. 69 Becomes Available

Once the rules and the allocations are finally adopted, the process of adjusting and fixing any errors or problems in separate rulemaking proceedings will be much more cumbersome and problematic than if those errors and problems are addressed comprehensively while this proceeding remains open. The 30-day time period for filing petitions for reconsideration would be insufficient to permit a full and careful assessment by each licensee of the effects of the DTV allocations on its stations, even if the technical methodology used and endorsed by the Commission for making such assessments were available. But OET Bulletin No. 69 -- the Commission document explaining and setting forth that methodology --

has not yet been released. Without that methodology and accompanying technical information, Guy Gannett and other television broadcasters are simply not able to determine with precision whether their stations will suffer unacceptable interference or whether more suitable alternatives are available. Accordingly, the Commission should afford licensees an ample additional period of time after OET Bulletin No. 69 is released to submit comments on the DTV allocations.

The Commission Should Reconsider its Allocation of Channel 2 to WTWC-TV

Without the benefit of OET Bulletin No. 69, it appears that at least one of Guy Gannett's stations is likely to face unacceptable interference and reductions in service area as the result of the DTV table of allocations.^{2/} Specifically, WTWC-TV, which currently operates on Channel 40 in Tallahassee, Florida, has been assigned Channel 2 for its DTV service. Historically, Channel 2 has been proven to be more prone to interference problems in connection with NTSC broadcasting than any other channel. While these problems generally result in impairment of NTSC picture quality, the effect on digital broadcasts will be more severe. When digital signals are disrupted beyond the capabilities of the error-correction technology used by digital television receivers, the result is a total loss of picture.

At least two types of interference that typically affect Channel 2 operations are potentially of a magnitude sufficient to cause such complete disruption: (1) Sporadic-E co-channel interferences, and (2) Impulse Noise interferences. Sporadic-E co-channel

^{2/} We also have concerns regarding two other stations -- WGME-TV and WGGB-TV -- which we will be able to analyze and assess more fully after OET Bulletin No. 69 becomes available.

interferences are a natural phenomenon especially rampant at Channel 2 frequencies and cannot be ameliorated by any technological means. Impulse noise interferences are generated by both natural sources (such as lightning) and man-made sources (such as utility power lines). Interference from utility infrastructures increases as those infrastructures age; it is already a serious problem, and will only get worse.

In light of these unique interference problems, there is reason to suspect that WTWC-TV will be unable to provide DTV service to its coverage area on Channel 2 -- or, at least, that its service will be severely impaired. Furthermore, Channel 2 may not be within the "core spectrum" to be used for broadcasting after the transition to DTV is completed, so that WTWC-TV will be required to incur the substantial costs of relocating its DTV service to its current NTSC channel (Channel 40). For all these reasons, Channel 2 is not a viable channel for WTWC-TV, and we request that the Commission reassign WTWC-TV to a more suitable DTV channel.

CONCLUSION

For the foregoing reasons, the Commission should (1) afford interested parties an opportunity to comment on the DTV Table of Allocations after OET Bulletin No. 69 is

released, and (2) reconsider its DTV allocation of Channel 2 to WTWC-TV and reassign the station to a more suitable channel.

Respectfully submitted,

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